



August 31, 2004

Via ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, DC 20554

Re: Notice of Oral Ex Parte Discussion in Docket No. ET 03-137

Dear Ms. Dortch:

On August 31, 2004, John Welch, from Motorola, Inc., met with Dr. Robert Cleveland to discuss issues related to the above-referenced proceeding.

The points raised in the meeting included:

1. The scientific and policy rationales for taking into account measurement uncertainty of SAR values when determining whether a Class II permissive change filing should be made for an authorized Part 15 transmitter module used in a new host device;
2. Effective occupational-user RF awareness methods and the distinctions between users of Part 90 portable and mobile devices and workers at antenna sites as regards the need for additional special considerations for occupational use, and;
3. The possibility that a proposed reference to Supplement C of OET Bulletin 65 in the rules may be misconstrued as a regulatory mandate and why the option of referring to relevant IEEE and IEC SAR measurement standards would be preferable.

I am filing this letter in the ECFS system.

Sincerely,

A handwritten signature in cursive script that reads 'John F. Welch'.

John F. Welch
Vice President and Director
Global EME Government Relations

JFW:amdes

cc: Dr. Robert Cleveland
Timothy Harr